

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

2013 APR 18 AM 9:24

DEPUTY CLERK *Yw*

UNITED STATES OF AMERICA

v.

JACLYN OLIVER(1)
ANTHONY AGUERO(2)

§
§
§
§
§

No.

1- 13 CR- 023-p

INDICTMENT

The Grand Jury Charges:

Count One

Possession of Stolen Mail Matter and Aiding and Abetting
(Violation of 18 U.S.C. §§ 1708 and 2)

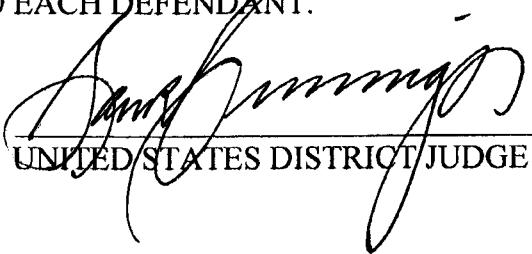
On or about January 16, 2013, in the Abilene Division of the Northern District of Texas, and elsewhere, the defendant, **Jaclyn Oliver**, did unlawfully have in her possession mail, articles, and things contained therein, to wit: one overdraft notice from First Bank Texas Abilene, Account Number #440XXXXX; one overdraft notice from Prosperity Bank Abilene, Account Number #641XXXX; and a bank statement from Abilene Teacher's Federal Credit Union, member number #53XXX, that had been stolen, taken, and abstracted from an authorized depository for mail matter, and the defendant possessed the mail, articles, and things contained therein, knowing them to have been stolen.

In violation of Title 18, United States Code, Sections 1708 and 2.

Filed in open court this 18th day of April, A.D. 2013.

Clerk

WARRANTS TO ISSUE AS TO EACH DEFENDANT.


UNITED STATES DISTRICT JUDGE

Count Two

Theft of Mail Matter and Aiding and Abetting
(Violation of 18 U.S.C. §§ 1708 and 2)

In or about December 2012, in the Abilene Division of the Northern District of Texas, and elsewhere, the defendants, **Jaclyn Oliver and Anthony Aguero**, did steal, take, and abstract from and out of an authorized depository for mail matter located in Abilene, Texas, mail, to wit: one overdraft notice from First Bank Texas Abilene, Account Number #440XXXX; one overdraft notice from Prosperity Bank Abilene, Account Number #641XXXX; and a bank statement from Abilene Teacher's Federal Credit Union, member number #53XXX.

In violation of Title 18, United States Code, Sections 1708 and 2.

Count Three

Possession of Stolen Mail Matter and Aiding and Abetting
(Violation of 18 U.S.C. §§ 1708 and 2)

On or about January 16, 2013, in the Abilene Division of the Northern District of Texas, and elsewhere, the defendant, **Jaclyn Oliver**, did unlawfully have in her possession mail, articles, and things contained therein, to wit: Bank of America credit card statement belonging to Steve L. Brewer, that had been stolen, taken, and abstracted from an authorized depository for mail matter, and the defendant possessed the mail, articles, and things contained therein, knowing them to have been stolen.

In violation of Title 18, United States Code, Sections 1708 and 2.

Count Four

Theft of Mail Matter and Aiding and Abetting
(Violation of 18 U.S.C. §§ 1708 and 2)

In or about December 2012, in the Abilene Division of the Northern District of Texas, and elsewhere, the defendants, **Jaclyn Oliver and Anthony Aguero**, did steal, take, and abstract from and out of an authorized depository for mail matter located in Abilene, Texas, mail, to wit: one Target National Bank statement, Account Number **xxxx-xxxx-xxxx-0092**.

In violation of Title 18, United States Code, Sections 1708 and 2.

Counts Five and Six

Possessing Forged and Counterfeited Securities and Aiding and Abetting
(Violation of 18 U.S.C. §§ 513(a) & 2)

On or about January 16, 2013, in the Abilene Division of the Northern District of Texas, and elsewhere, **Jaclyn Oliver** and **Anthony Aguero**, defendants, did possess forged and counterfeited securities of an organization, as that term is defined in Title 18, United States Code, Section 513(c)(4), with the intent to deceive another person and organization:

Count No.	Check No.	Name of Drawer	Name of Financial Institution	Amount of Check
5	200	Luke Bennett	First National Bank of Anson	\$980.00
6	212	Luke Bennett	First National Bank of Anson	\$485.00

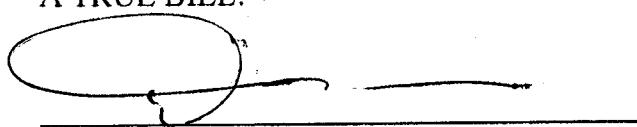
Each count being a violation of Title 18, United States Code, Sections 513(a) and 2; and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Seven
Mail Fraud
(Violation of 18 U.S.C. §§ 1341 & 2)

On or about November 20, 2012, in the Abilene Division of the Northern District of Texas and elsewhere, **Jaclyn Oliver**, defendant, devised and intended to devise a scheme and artifice to defraud, and for obtaining money and property from Merrill Edge, that is checks, by means of false and fraudulent pretenses, representations and promises, well knowing at the time that the pretenses, representations and promises were false and fraudulent when made, in that defendant never intended to place any funds in the account, and for the purpose of executing and attempting to execute the scheme and artifice to defraud, knowingly caused a matter or thing to be delivered by United States Mail, according to the directions thereon, that being several books of checks issued by Merrill Edge.

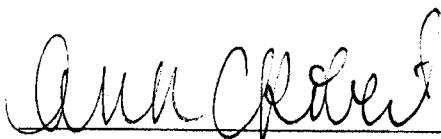
A violation of Title 18, United States Code, Sections 1341 and 2.

A TRUE BILL:



FOREMAN

SARAH R. SALDAÑA
UNITED STATES ATTORNEY



ANN C. ROBERTS

Assistant United States Attorney
Texas State Bar No. 24032102
1205 Texas Avenue, Suite 700
Lubbock, Texas 79401
Telephone: 806.472.7397
Facsimile: 806.472.7324
Email: ann.roberts@usdoj.gov

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

ABILENE DIVISION

THE UNITED STATES OF AMERICA

v.

JACLYN OLIVER
ANTHONY AGUERO

INDICTMENT

COUNTS 1 & 3: POSSESSION OF STOLEN MAIL AND AIDING AND ABETTING
Title 18, United States Code, Sections 1708 & 2.

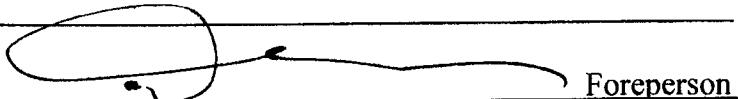
COUNTS 2 & 4: THEFT OF MAIL MATTER AND AIDING AND ABETTING
Title 18, United States Code, Sections 1708 & 2

COUNTS 5-6: POSSESSION OF COUNTERFEIT SECURITIES OF AN ORGANIZATION AND AIDING AND ABETTING
Title 18, United States Code, Sections 513(a) & 2.

COUNT 7: MAIL FRAUD AND AIDING AND ABETTING
Title 18, United States Code, Sections 1341 & 2.

(7 COUNTS)

A true bill rendered:
Lubbock



Foreperson